

Exhibit F

4/2/13

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MRI SOFTWARE, LLC,)	CASE NO.: 1:12-CV-01082
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
vs.)	<u>DEFENDANT'S ANSWER AND</u>
)	<u>OBJECTION TO PLAINTIFF'S FOURTH</u>
LYNX SYSTEMS, INC.,)	<u>SET OF INTERROGATORIES</u>
)	
Defendant.)	

Now comes Defendant Lynx Systems, Inc., by and through counsel, Mazanec, Raskin & Ryder Co., L.P.A., and for its answer and objection to Plaintiff's Fourth Set of Interrogatories states as follows:

INTERROGATORY NO. 14:

As to each MRI Related Service provided by Lynx and identified in response to Interrogatory No. 4, identify each such service that was performed without using MRI Software, and as to those services performed using MRI Software, state whether the copy belonging to the customer or the copy residing on Lynx's computer(s) was used.

Answer:

OBJECTION. Lynx objects to this Interrogatory to the extent it seeks attorney work product. Lynx further objects to this Interrogatory as it is vague, ambiguous, overly broad and overly burdensome. Further, Lynx objects to this Interrogatory to the extent it seeks information that is neither relevant nor reasonably calculated to lead to the discovery or relevant evidence regarding work performed prior to MRI's introduction of its current form of "Master Agreement." Lynx further objects to this Interrogatory because it contains multiple subparts that each constitute a separate interrogatory such that MRI has exceeded the number of interrogatories permitted for this case. As propounded, this Interrogatory embodies two distinct subparts for each of the hundreds of instances of "MRI Related Service" identified by Lynx in response to Interrogatory No. 4, each of which could include up to five separate types of services (identified as "Lynx Custom," "Lynx Reports," "Lynx App," "Other" and "Lynx Support"). Subject to, and without waiving, the foregoing objections and its prior objections, including its objections to the definitions of "MRI Software," Lynx answers that, where it has identified that it provided

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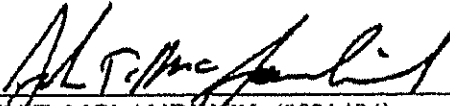
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CLIENT # 34771 MATTER # 04001

services under the categories of "Lynx Custom", "Lynx Reports" and "Lynx Apps" on the spreadsheets produced in response to Interrogatory No. 4, it used the customer's version of Toolkit where the customer had Toolkit in its possession. MRI's records should reflect which customers had Toolkit. Further, where the customer did not have its own copy of Toolkit, Lynx used its copy of Toolkit to perform the services identified under the categories of "Lynx Custom," "Lynx Reports" and "Lynx Apps" on the spreadsheets produced in response to Interrogatory No. 4, up until the time it destroyed its MRI software on or about November 22, 2012, pursuant to the parties' stipulation. With respect to items listed in the columns identified as "Other" and "Lynx Support," for upgrades, Lynx merely installed client-supplied upgrade software on their computers, and as such did not "use" MRI software. With respect to "support" and "training," Lynx used its customers' software, with extremely rare exception, which Lynx cannot identify at this time. With respect to billings for hosting services, no MRI Software was used to provide that service.

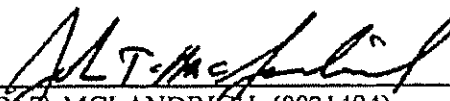
As to all objections,



JOHN T. MCLANDRICH (0021494)
TAMI Z. HANNON (0079812)
DAVID M. SMITH (0079400)

Respectfully submitted,

MAZANEC, RASKIN & RYDER CO., L.P.A.



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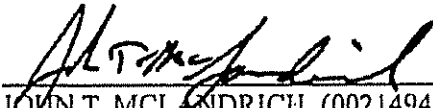
Counsel for Defendant Lynx Systems, Inc.

CERTIFICATE OF SERVICE

A copy of the foregoing Defendant's Answers and Objection to Plaintiff's Fourth Set of Interrogatories was served April 2, 2013 via email to the following:

Georgia K.E. Yanchar, Esq.
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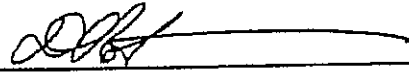
Counsel for Defendant Lynx Systems, Inc.

BERKL-120121\Lynx Ans to MRIs 4 ROG

VERIFICATION

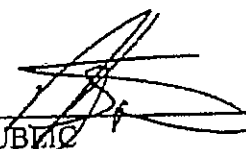
I, DON ROBINSON, hereby certify that the foregoing answer to Plaintiff's Fourth Set of Interrogatories is true and accurate according to my first-hand knowledge.

EXECUTED ON April 2nd, 2013.



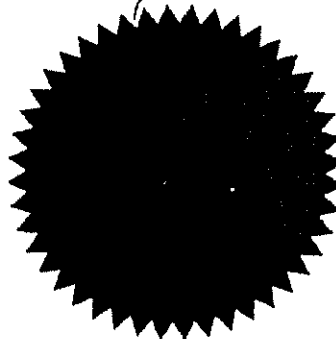
DON ROBINSON

Sworn to and Subscribed in my presence this 2nd day of April, 2013.



NOTARY PUBLIC

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